

NATURAL RESOURCES COMMISSION

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James J. Blanchard, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
 BOX 30028
 LANSING, MI 48909
 HOWARD A. TANNER, Director

RECEIVED
 DEPT. OF NATURAL RESOURCES
 JUNE 21 1983

June 21, 1983

Davis Manufacturing Company
 P.O. Box 1437
 Troy, MI 48099

EPA ID No: MID 006000293

Dear Mr. Tom Settle:

On June 7, 1983, I conducted an inspection of your facility located at 930 North Main Street, Clawson, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. Appropriate placards according to the Department of Transportation regulations for hazardous materials under 49 CFR Part 172, Subpart F are not available for offering to the initial transporter or for placarding by the generator prior to transporting as required per 40 CFR 262.33.
2. Facility personnel has not successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of RCRA as required per 40 CFR 265.16(a)(b)(c). (A copy of these regulations is enclosed.)
3. Personnel training records/documents have not been developed and maintained at the facility as required per 40 CFR 265.16(d)(e). (A copy of these regulations is enclosed.)
4. The owner/operator has not attempted to make arrangements, as appropriate with local authorities as required per 40 CFR 265.37.
5. A contingency plan for the facility has not been developed and maintained at the facility as required per 40 CFR 265 - Subpart D.

US EPA RECORDS CENTER REGION 5




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DAVIS Mfg. Co.
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You are requested to respond to this letter by July 10, 1983 providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION



Laura L. Lodisio
DETROIT DISTRICT OFFICE